

# EXHIBIT 1

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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JAMES CONTANT, *et al.*,

*Plaintiffs,*

v.

BANK OF AMERICA CORPORATION;  
BANK OF AMERICA, N.A.; MERRILL  
LYNCH, PIERCE, FENNER & SMITH  
INC.; THE BANK OF TOKYO  
MITSUBISHI UFJ LTD.; BARCLAYS  
BANK PLC; BARCLAYS CAPITAL INC.;  
BNP PARIBAS GROUP; BNP PARIBAS  
NORTH AMERICA, INC.; BNP PARIBAS  
SECURITIES CORP.; BNP PARIBAS  
PRIME BROKERAGE, INC.; CITIGROUP  
INC.; CITIBANK, N.A.; CITIGROUP  
GLOBAL MARKETS INC.; CREDIT  
SUISSE GROUP AG; CREDIT SUISSE  
AG; CREDIT SUISSE SECURITIES  
(USA) LLC; DEUTSCHE BANK AG;  
DEUTSCHE BANK SECURITIES INC.;  
THE GOLDMAN SACHS GROUP, INC.;  
GOLDMAN, SACHS & CO.; HSBC  
HOLDINGS PLC; HSBC BANK PLC;  
HSBC NORTH AMERICA HOLDINGS,  
INC.; HSBC BANK USA, N.A.; HSBC  
SECURITIES (USA) INC.; JPMORGAN  
CHASE & CO.; JPMORGAN CHASE  
BANK, N.A.; MORGAN STANLEY;  
MORGAN STANLEY & CO., LLC;  
MORGAN STANLEY & CO.  
INTERNATIONAL PLC; RBC CAPITAL  
MARKETS LLC; ROYAL BANK OF  
SCOTLAND GROUP PLC; RBS  
SECURITIES INC.; SOCIÉTÉ  
GÉNÉRALE S.A.; STANDARD  
CHARTERED BANK; UBS AG; UBS  
GROUP AG; and UBS SECURITIES LLC,

*Defendants.*

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DOCKET NO. 1:17-cv-03139-LGS

DECLARATION OF ELIZABETH  
HYON IN SUPPORT OF FOREIGN  
DEFENDANTS' MOTION TO  
DISMISS FOR LACK OF  
PERSONAL JURISDICTION

I, Elizabeth Hyon, declare under penalty of perjury as follows:

1. I am a Director in Legal for Barclays Bank PLC (“BBPLC”) in New York, NY.
2. I submit this declaration in support of the Foreign Defendants’ Motion to Dismiss for Lack of Personal Jurisdiction in the above-captioned action. The facts stated herein are true and correct, to the best of my knowledge, based on records maintained by BBPLC in the ordinary course of business.
3. Except where otherwise indicated, all statements concern facts as of June 30, 2017, and describe the operations of only BBPLC, not any separately incorporated and distinct subsidiary entities.
4. BBPLC is a financial institution organized under the laws of England and Wales.
5. BBPLC’s registered office and headquarters are located at 1 Churchill Place in London, England.
6. BBPLC is primarily a British bank with extensive business operations throughout the United Kingdom. BBPLC has 34 branches located outside of the United Kingdom, two of which are located in the United States.

BBPLC’s U.S. Operations

7. BBPLC is registered as a financial holding company with the Federal Reserve Bank of New York pursuant to the Bank Holding Company Act of 1956, 12 U.S.C. § 1841 *et seq.*
8. Two of BBPLC’s 34 worldwide branches located outside of the United Kingdom are in the United States. BBPLC has one branch located in New York, New York and another in Miami, Florida.

9. BBPLC has Representative Offices located in Newark, Delaware; Wilmington, Delaware; and New York, New York. It has no other Representative Offices in the U.S. These Representative Offices do not generate any revenue for BBPLC and engage in only limited activity, such as acting as a liaison with clients located in the United States, collecting information about the U.S. economy, and providing information about BBPLC to U.S. investors.

10. BBPLC owns no real estate in the United States.

11. In 2016, BBPLC's U.S. branches generated \$1.45 billion in revenue, which accounted for approximately 4.77% of BBPLC's \$30.48 billion worldwide revenue in 2016.

12. By way of comparison, in 2016, BBPLC's U.K. operations generated \$15.42 billion in revenue, which accounted for approximately 50.6% of BBPLC's \$30.48 billion worldwide revenue in 2016.

13. Approximately 431, or less than 0.5%, of BBPLC's approximately 104,534 full-time permanent payroll employees worldwide were located in the United States.

BBPLC's New York Operations

14. One of BBPLC's 34 branches worldwide is located in New York.

15. BBPLC owns no real estate in New York.

16. BBPLC is registered as a Foreign Bank Branch and as an Exempt Mortgage Loan Servicer with the New York Department of Financial Services.

17. BBPLC holds a Debt Collector Agency license issued by the New York City Department of Consumer Affairs.

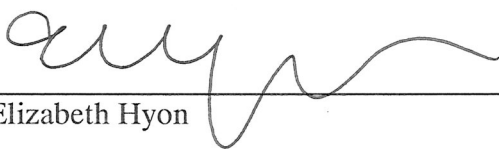
18. Approximately 422, or less than 0.5%, of BBPLC's approximately 104,534 full-time permanent payroll employees worldwide were located in New York.

19. In 2016, BBPLC's New York branch generated \$1.45 billion in revenue, which accounted for approximately 4.76% of BBPLC's \$30.48 billion worldwide revenue in 2016.

\* \* \*

20. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct, to the best of my knowledge, information and belief, based on records maintained by BBPLC in the ordinary course of business.

Executed in New York, NY on August 10, 2017.

  
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Elizabeth Hyon